

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY
Caption in Compliance with D.N.J. LBR 9004-1(b)**

WOMBLE BOND DICKINSON (US) LLP

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Counsel for Ad Hoc Committee of States

In re:

LTL MANAGEMENT LLC,

Debtor.¹

Case No.: 23-12825 (MBK)

Chapter: 11

Hon. Michael B. Kaplan

**VERIFIED STATEMENT OF THE AD HOC COMMITTEE
OF STATES HOLDING CONSUMER PROTECTION CLAIMS
PURSUANT TO BANKRUPTCY RULE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), Womble Bond Dickinson (US) LLP (“Ad Hoc Committee Counsel”), counsel to the Ad Hoc Committee of States Holding Consumer Protection Claims (“Ad Hoc Committee of States”), hereby submits this verified statement (the “Verified Statement”) in the Chapter 11 case (the “Bankruptcy Case”) of LTL Management LLC (the “Debtor”)², and in support thereof states as follows:

¹ The last four digits of the Debtor’s taxpayer identification number are 6622. The Debtor’s address is 501 George Street, New Brunswick, New Jersey 08933.

² Ad Hoc Committee Counsel submitted a Verified Statement and subsequent supplement and modification thereto in the Debtor’s previous chapter 11 case, 21-30589-MBK. *See* Docket Nos. 2280, 2291 and 3062.

1. The Ad Hoc Committee of States was initially formed on or about March 15, 2022, and retained Ad Hoc Committee Counsel to represent the Ad Hoc Committee of States in connection with consumer protection claims alleged or asserted by the members of the Ad Hoc Committee of States against the Debtor or predecessors or affiliates of the Debtor under applicable state law.

2. The Ad Hoc Committee of States currently consists of the parties-in-interest set forth in **Exhibit A** (each a “Member State”). As disclosed on Exhibit A, each Member State is a party-in-interest and holds claims and interests against the Debtor and certain of its non-debtor affiliates that may include, but are not necessarily limited to, unsecured claims in unliquidated amounts and entitlement to equitable and other injunctive relief.

3. The agreement establishing the Ad Hoc Committee of States is attached hereto as **Exhibit B**.

4. Nothing contained in this Verified Statement (or Exhibits A and B hereto) is intended to, nor should be construed to, constitute (a) a waiver or release of any claims filed or to be filed against, or interests in, the Debtor held by any Member State or any other entity, (b) a waiver of the sovereignty of any state that may be a member of the Ad Hoc Committee of States, (c) a waiver or consent to the jurisdiction of the Bankruptcy Court; or (d) an admission with respect to any fact or legal theory. Nothing herein should be construed as a limitation upon, or waiver of, any rights of any Member State to assert, file and/or amend any proof of claim in accordance with applicable law and any Orders entered in this Bankruptcy Case.

5. Other than as described herein, the Member States and the Ad Hoc Committee of States do not purport to act, represent, or speak on behalf of any other entities in connection with the Bankruptcy Case.

6. The undersigned declares under penalty of perjury that this Verified Statement is true and accurate to the best of her knowledge, information and belief.

7. Ad Hoc Committee Counsel reserves the right to amend or supplement this Verified Statement as necessary, in accordance with Bankruptcy Rule 2019.

Dated: May 11, 2023

By: /s/ Ericka F. Johnson
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